

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA  
WHEELING**

**RANCEL JERAMY CROSS**, Individually,  
**RACHEL CROSS**, Individually, **RANCEL  
JERAMY CROSS**, as Natural Guardian of  
S.C., a minor, T.C., a minor and L.C., a  
minor, and **RACHEL CROSS**, as Natural  
Guardian of S.C., a minor, T.C., a minor  
And L.C., a minor,

Plaintiffs,

vs.

**Civil Action No. 5:21-CV-12  
Judge Bailey**

**CAM SAFETY, LLC a/k/a/ and d/b/a  
XCAM; XCAM, LLC a/k/a and d/b/a/  
CAM SAFETY; EQT CORPORATION;  
EQT PRODUCTION COMPANY; PROFRAC  
SERVICES, LLC; BOTHA TRUCKING, LLC;  
JOHN DOE 1; JOHN DOE 2; and JOHN DOE 3,**

Defendants.

**STIPULATION OF DISMISSAL BETWEEN PLAINTIFFS AND DEFENDANTS  
BOTHA TRUCKING, LLC, PROFRAC SERVICES, LLC, EQT CORPORATION, EQT  
PRODUCTION COMPANY AND JOHN DOE 2**

Plaintiffs, Rancel Jeramy cross, Individually, Rachel Cross, Individually, Rancel Jeramy Cross, as Natural Guardian of S.C., a minor, T.C., a minor, and L.C., a minor, and Rachel Cross, as Natural Guardian of S.C., a minor, T.C., a minor, and L.C., a minor (“Plaintiffs”), by counsel, and Defendants, Botha Trucking, LLC (“Botha”), ProFrac Services, LLC (“ProFrac”), EQT Corporation, EQT Production Company (“EQT Entities”), and John Doe 2, by their respective counsel, hereby stipulate and agree that Plaintiffs’ cause against Botha, ProFrac, John Doe 2, and

EQT Entities only should be dismissed, *without prejudice*, with each party to bear its own costs and attorneys' fees.

Respectfully submitted,

**RANCEL JERAMY CROSS**, Individually,  
**RACHEL CROSS**, Individually, **RANCEL  
JERAMY CROSS**, as Natural Guardian of  
S.C., a minor, T.C., a minor and L.C., a  
minor, and **RACHEL CROSS**, as Natural  
Guardian of S.C., a minor, T.C., a minor  
And L.C., a minor,

Plaintiffs,

Date: August 20, 2021

By: /s/ Christopher J. McCabe, Esq.  
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*Counsel for Plaintiffs*

Date: 08/20/2021

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Date: 08/20/2021

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*Counsel for ProFrac Services, LLC*

Date: 08/20/2021

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*Counsel for EQT Corporation  
And EQT Production Company*

**CERTIFICATE OF SERVICE**

Service of the foregoing STIPULATION OF DISMISSAL was had upon the Defendants herein on the 20<sup>th</sup> day of August, 2021, by filing electronically with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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*Counsel for EQT Corporation  
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Service of the foregoing STIPULATION OF DISMISSAL was had upon the unrepresented Defendant herein on the 20<sup>th</sup> day of August, 2021 by regular U.S. mail to:

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4887 Glen Rose Highway – Suite 101  
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Cam Safety, LLC  
P.O. Box 1366  
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*Defendant*

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